

**Mao Declaration
EXHIBIT A
Redacted Version of
Document Sought to be Sealed**

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
Carl Spilly (admitted *pro hac vice*)
carlspilly@quinnemanuel.com
1300 I Street, N.W., Suite 900
Washington, D.C. 20005
Telephone: 202-538-8000
Facsimile: 202-538-8100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Jomaire A. Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Attorneys for Defendant Google LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, et al., individually and
on behalf of all similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**SUPPLEMENTAL DECLARATION OF
MARTIN SRAMEK IN RESPONSE TO
May 20, 2022 ORDER**

Referral: Hon. Susan van Keulen, USMJ

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1 I, Martin Sramek, declare as follows:

2 1. I am the Privacy Working Group lead for Chrome. I have been employed at Google
3 since October 2014, and I have worked on issues related to Chrome privacy for the duration of my
4 tenure. I make this declaration based on personal knowledge and information provided to me by
5 Google colleagues and, if called to testify, I could and would competently testify to such facts.

6 2. I understand that the Court has ordered that "Google must provide Plaintiffs with a
7 representation in writing no later than May 31, 2022 that other than the logs identified thus far as
8 containing Incognito-detection bits, no other such logs exist."

9 3. Pursuant to the Court's order, I submitted a declaration on May 31, 2022. That
10 declaration noted that "[t]he investigation is ongoing and should be completed within the next two
11 weeks, by June 14, 2022," and I "reserve[d] the right to supplement my attestation with any
12 additional finding resulting from this continued investigation."

13 4. The additional two-week investigation referenced in my May 31, 2022 declaration is
14 now concluded. For that investigation, I worked with Google employee Matt Harren, the [REDACTED]
15 Logs Technical Lead, to identify additional logs containing Incognito-detection bits. In addition, I
16 supervised a robust code audit to identify any additional uses of the X-Client-Data header for
17 Incognito detection. Our investigation led to the identification of the additional logs identified in the
18 charts attached hereto as Exhibit A.

19 5. My further investigation confirmed that when the maybe_chrome_incognito bit was
20 added to the [REDACTED] or [REDACTED] logs previously identified
21 by Google, it was copied to each of the logs identified in Exhibit A. This replication to additional
22 logs is an artifact of Google's backend infrastructure, which is constructed to direct data traffic
23 collected for a targeted purpose to a targeted log.

24 6. The logs identified in Table 1 of Exhibit A are [REDACTED] logs that begin with
25 the prefix [REDACTED] meaning they are used for experiments that extract data from the [REDACTED]
26 [REDACTED] or [REDACTED] logs and perform analysis and modeling to
27 predict ad revenues. These do not record unique records of user browsing beyond what is recorded
28 in the [REDACTED] or [REDACTED] logs.

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1 7. The logs identified in Table 2 of Exhibit A are [REDACTED] logs. These are currently used
2 for analysis and testing. They do not record additional data regarding user browsing beyond what is
3 recorded in the [REDACTED] or [REDACTED] logs.

4 8. The logs identified in Table 3 of Exhibit A are [REDACTED] logs. [REDACTED]
5 [REDACTED]
6 [REDACTED] They do not record additional data regarding user browsing beyond what is
7 recorded in the [REDACTED] logs. Google previously disclosed [REDACTED] logs.

8 9. The logs identified in Table 4 of Exhibit A are [REDACTED] logs. [REDACTED]
9 [REDACTED]
10 [REDACTED] The [REDACTED] log [REDACTED] contains information
11 regarding user browsing that was included in two other logs previously disclosed by Google,
12 [REDACTED] and [REDACTED] The log [REDACTED]
13 [REDACTED] contains joined information from [REDACTED]
14 [REDACTED]
15 [REDACTED],
16 all of which were previously disclosed by Google. The other [REDACTED] logs in Table 4 of Exhibit A
17 contain [REDACTED], which were not previously disclosed by Google, joined with
18 [REDACTED].

19 10. The logs identified in Table 5 of Exhibit A are [REDACTED] logs. [REDACTED]
20 [REDACTED]

21 11. The logs identified in Table 6 of Exhibit A are [REDACTED]
22 [REDACTED]

23 12. The investigation also identified the log [REDACTED], which
24 contains the field "is_chrome_non_incognito_mode." That log does not contain any GAIA, Biscotti,
25 or Zwieback identifiers.

26 13. In Google's previous disclosures and in my previous declaration, a typographical
27 error led to the inadvertent disclosure of the test version of log [REDACTED]
28 [REDACTED] The correct name for the equivalent log that contains data for

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1 users of Google services is [REDACTED]. Google searched [REDACTED]
2 [REDACTED] pursuant to the Special Master process. Another typographical
3 error appeared in the log named [REDACTED] - the correct name is [REDACTED]
4 [REDACTED]

5 I declare under penalty of perjury of the laws of the United States of America that the
6 foregoing is true and correct.

7
8 Executed on the 14th day of June 2022 at Munich, Germany.

9
10 DATED: June 14, 2022

11 /s/ Martin Sramek

12 Martin Sramek
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Exhibit A

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY**Table 1 - [REDACTED] Logs**

Log	Incognito Bit
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team

Table 2 - [REDACTED] Logs

Log	Incognito Bit
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team

Table 3 - [REDACTED] Logs

Log	Incognito Bit
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY**Table 4 - [REDACTED] Logs**

Log	Incognito Bit
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team

Table 5 - [REDACTED] Logs

Log	Incognito Bit
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team

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1	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
2		
3	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
4	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
5	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
6		
7	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
8	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
9	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
10	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
11		
12	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team

Table 6 - [REDACTED] Logs

15	Log	Incognito Bit
16	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
17	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
18	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
19		